

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN THE MATTER OF:**

Shawn Anthony & Rashyeda Karima Lewis,  
Debtor(s).

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CHAPTER 13

CASE NO. 13-61677-TJT

JUDGE THOMAS J. TUCKER

**TRUSTEE'S OBJECTIONS TO  
CONFIRMATION OF CHAPTER 13 PLAN**

**NOW COMES**, the Chapter 13 Trustee, Tammy L. Terry, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E.D. Mich. L.B.R. 3015-3(a) and 11 U.S.C. §1307(c)(5) as follows:

1. The Trustee requests that the debtor provide copies of three (3) post-petition pay stubs at least fourteen days prior to confirmation.

2. The debtor's Plan fails to provide that all of the debtor's projected disposable income be utilized to fund the Plan. Specifically, the debtor's Schedule J has overstated the following expense(s) in contravention of 11 U.S.C. 1325(a)(3) and/or 11 U.S.C. 1325(b):

- a. Charitable contributions \$450.00 a month.
- b. Child Care and Childrens cost \$400.00 a month.
- c. Vehicle Insurance \$450.00 a month.

The Trustee requests that the debtor provide proof of these expenses within fourteen days.

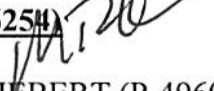
3. The Plan fails to provide that 100% of profit sharing funds and/or bonuses received by the debtor during the pendency of the Plan be remitted to the Trustee for distribution among creditors in contravention of 11 U.S.C. 1325(b) and In re Freeman, 86 F.3d 478 (6<sup>th</sup> Cir., 1996).

4. The debtor indicates in Section II.A. that the debtor have used their 2013 income tax refund to purchase a vehicle. The Trustee requests that the debtor provide a copy of their 2013 tax returns as well as proof of their purchase of this vehicle.

**WHEREFORE**, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's (s') Chapter 13 Plan and dismiss this case pursuant to 11 U.S.C. §1307(c)(5).

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT  
Tammy L. Terry, Chapter 13 Trustee

March 3, 2014

/S/ TAMMY L. TERRY (P-46254)   
Chapter 13 Standing Trustee  
/s/ KIMBERLY SHORTER - SIEBERT (P-49608)  
/s/ MARILYN R. SOMERS-KANTZER (P-52488)  
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**CERTIFICATE OF MAILING**

I hereby certify that on March 3, 2014, a copy of **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** was electronically filed with the Clerk of Court, served electronically to the debtor's(s') attorney and a copy of same deposited in the U. S. Mail to the debtor (s) at the address as it appears below.

/s/ Lisa R. Hill

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